

# Checklist

## Individual exemption application

(other than PPA providers)

[Retail Exempt Selling Guideline](#) – July 2022 (Appendix B)

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### Instructions

1. Submit this completed checklist as part of your application, alongside a cover letter and supporting evidence, as required.
2. Applications should be submitted in DOCX (Microsoft Word) format, where possible.
3. If we identify missing or inconsistent information, we will seek clarification *before* accepting your application. We will only request further information on **one** occasion.
4. We will only accept applications that we deem to have met the minimum information requirements set out in this checklist.
5. Upon acceptance, your application will be published on the AER website for public consultation. The consultation period will run for 20 business days, whereby interested stakeholders can make submissions. Any submissions received will inform our application assessment process.
6. If your application includes confidential information, please submit two versions of the document – one marked **confidential** and one marked **public**:
  - a) any information the applicant deems to be confidential information must be redacted in the public version. The public version will be published on our website for public consultation.
  - b) confidential information will be handled in accordance with our [ACCC/AER Information Policy](#).

### Prerequisite requirement

Please tick the boxes in relation to the following statements:

*I confirm I have read and understood all the instructions listed above:*

*I hereby declare that the information provided below is true and correct. I also understand that any wilful dishonesty may render for refusal of this application*

## General information requirements

Please provide the below information as part of your application. Where a third party is submitting the application on your behalf, please provide a statement or letter verifying that the third party has the authority to act on your behalf.

Requirement	Applicant response
<b>General information requirements</b>	
1 Your legal name. <sup>1</sup> If you are a body corporate or community corporation, please indicate this.	South Street Energy Pty Ltd
2 Your trading name, if different to your legal name.	N/A
3 Your Australian Business Number (ABN) or Australian Company Number (ACN). Confirm your ABN or ACN matches the legal name you have provided via the <a href="#">ABN Lookup</a> website or <a href="#">ASIC Connect</a> website respectively.	62 157 916 099
4 Your registered postal address. We may verify this information with the Australian Securities and Investments Commission (ASIC) or another relevant agency.	140B Dawson Street, Brunswick, VIC 3056
5 A nominated contact person, including their position in the organisation and contact details.	Marco Bogaers Director South Street Energy Pty Ltd 140B Dawson Street Brunswick VIC 3056 [REDACTED]
6 The primary activity of your business (for example, managing a shopping centre or managing residential accommodation).	South Street Energy provides commercial energy brokering services, small scale renewable generation services and billing services for embedded network exemption holders.
7 Why you are seeking an individual exemption, and why you consider an individual exemption is appropriate to your circumstances (rather than a retailer authorisation or registrable class exemption).  <i>Refer section 3 – <a href="#">Retail Exempt Selling Guideline</a> pg. 10</i>	<p>South Street Energy seeks an individual exemption allowing it to procure electricity from an authorised retailer to on-sell to 42 commercial/retail tenants (including vacant sites &amp; common areas) and operate the Crossroads Homemaker Centre as an embedded network (Registerable exemption Classes R1, R5, NR1 &amp; NR5).</p> <p>As an existing site, conversion falls under Section 4.9 of the Electricity Network Service Provider – Registration Exemption Guideline and Section 4.4 of the Retail Exemption Selling Guideline.</p> <p>South Street Energy is engaged by Perpetual Corporate Trust as trustee for AM Crossroads Unit Trust (“the Landlord”) to occupy the site, and provide market compliant smart-meters for each tenancy (via an AEMO accredited Metering Coordinator), and operate the site as an embedded network.</p> <p>South Street Energy typically operates as a billing and collection agent for retail exemption holders, but seeks an exemption in its own right for the Crossroads Homemaker Centre to relieve the Landlord of the need to maintain duplicated financial accounts (necessary under the agency model to submit Business Activity Statements).</p> <p>South Street Energy also seeks an individual exemption in its own right as the next step towards obtaining retailer authorisation (should South Street</p>

<sup>1</sup> The applicant must be a legal person, for example an individual, company, corporation, or body corporate. A trust is not a legal person and cannot hold an exemption. If you are seeking an exemption for a trust, a trustee must apply.

Requirement	Applicant response
<b>General information requirements</b>	
	Energy expand its services across New South Wales & Queensland).
8	The site address where you intend to sell energy Please attach a site map as an appendix to this checklist. The Crossroads Homemaker Centre is located at the intersection of Beech Road & Camden Valley Way, Casula NSW 2170.
9	Provide a brief description of this site and its current and future intended use/s. The Crossroads Homemaker Centre is home to specialty retailers offering furniture, bedding, whitegoods, lighting and other products for the home, together with food & beverage outlets. The purpose of the embedded network retrofit is to enable tenants to share solar electricity and access greener electricity at cheaper rates. The project continues the Landlord's commitment to environmental sustainability by installing 1.8-2.4 MW of solar generation capacity along with electric storage facilities (BESS).
10	The <i>form</i> of energy for which you are seeking the individual exemption (electricity or gas, or both). Electricity <input checked="" type="checkbox"/> Gas <input type="checkbox"/> Electricity & Gas <input type="checkbox"/>
11	If you selected electricity (above), state whether the relevant network is directly or indirectly connected to the main grid or is (or will be) an off-grid network. The relevant network is directly connected to the local distribution network.
12	Are you establishing, or have you established, energy supply in an area where there are no other viable energy supply arrangements available? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, please provide further information. If no, please provide examples of how customers will be able to access alternatives, should they choose to utilise their power of choice.
13	The date from which you intend to start selling energy. 1/02/2025
14	Mailing addresses for premises at the site (where applicable). We may use this information to ensure that potential customers are able to participate in our consultation process. Refer to the Crossroads Tenants Listing attached with this Application.
15	Details of your (or your agent's) energy selling experience, for example: <ul style="list-style-type: none"> <li>• date/s and location/s of previous operations</li> <li>• form/s of energy sold</li> <li>• scale of operations (the number, size, and type of customers)</li> <li>• an explanation of which activities will be conducted in-house, and which will be contracted out to third parties.</li> </ul> South Street Energy provides billing & collections services, as an agent, across 20 embedded networks in Victoria and 1 in New South Wales – servicing 80 retail/commercial electricity customers and 1,030 residential electricity customers, including retirement & social housing customers. South Street Energy commenced providing embedded network services in early 2018 and has slowly expanded its network in line with service capabilities. South Street Energy contracts the following from third parties: <ol style="list-style-type: none"> <li>1. Metering services are contracted to an AEMO accredited Metering Coordinator (all 1,110 customers have a market compliant smart meter);</li> <li>2. Embedded network management is contracted to an AEMO registered Embedded Network Manager (all 1,110 customers have a NMI registered in MSATS); and</li> </ol>

Requirement		Applicant response
<b>General information requirements</b>		
		3. Inbound telephone calls are directed to an answering service (noting that all enquiries are addressed by an in-house customer service team). Billing is managed inhouse using Utilibill and customer enquiries are managed through Zoho.
16	Do you currently hold; or have you previously held; or been refused an energy selling exemption or a retail licence (retailer authorisation) in any state or territory? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, please provide details (including any relevant AER reference number/s).	
17	Have you have made arrangements in the event that you can no longer continue supplying energy (for example, whether the retailer that sells to you has agreed that they will service the customers)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, please explain the arrangements you have put in place. If no, please provide the reasons why you have not put arrangements in place. <i>If an exempt seller is (or expects to be) disconnected, or there is any likelihood that they will be unable to continue selling energy, they must notify the exempt customers and the AER immediately. As part of this notification, the exempt seller must advise the steps they are taking to arrange an alternative supply.</i>	South Street Energy has the financial resources for its scale of operations and does not consider it will be in a position where it can no longer continue supplying electricity. In addition, South Street Energy has two immediate risk mitigation strategies: 1. South Street Energy operates predominantly as an agent and bears no market risk for unpaid customer bills; and 2. South Street Energy intends to procure electricity from an authorised retailer – with no exposure to wholesale price volatility (in any event South Street Energy operates an extensive network of small-scale generators to manage exposure to wholesale price volatility). In the event that South Street Energy elects to no longer service the Crossroads Homemaker Centre, it will notify the Landlord and provide sufficient time to make alternative arrangements, with no adverse effect on customers.

## Particulars relating to the nature and scope of the proposed operations

To determine whether it is appropriate to exempt you from the requirement to hold a retailer authorisation, we need information on the nature and scope of the proposed operations.

Requirement		Applicant response								
<b>Particulars relating to the nature and scope of the proposed operations</b>										
18	What is the total number of customers at the site? Please provide a breakdown between residential, retail, and commercial customers (include whether they are small or large, as defined for the jurisdiction in which you intend to operate). <i>The threshold for large electricity customers in New South Wales, the ACT, Queensland, and Victoria is 100 MWh per annum, 150 MWh per annum in Tasmania and 160MWh per annum in South Australia. For gas, the threshold in all jurisdictions is 1 TJ per annum.</i>	<table border="1"> <tbody> <tr> <td>Residential</td> <td>0</td> </tr> <tr> <td>Commercial/retail (small customers)</td> <td>22</td> </tr> <tr> <td>Large customers</td> <td>20</td> </tr> <tr> <td><b>Total</b></td> <td><b>42</b></td> </tr> </tbody> </table>	Residential	0	Commercial/retail (small customers)	22	Large customers	20	<b>Total</b>	<b>42</b>
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Commercial/retail (small customers)	22									
Large customers	20									
<b>Total</b>	<b>42</b>									
	Will your customers be your tenants? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The customers are tenants of the Landlord (Perpetual Corporate Trust Limited as Trustee for AM Crossroads Unit Trust ABN: 99 000 341 533).								

Requirement	Applicant response
<b>Particulars relating to the nature and scope of the proposed operations</b>	
<p>19 Will you be providing other services, aside from energy to persons on the site (for example, accommodation/leasing of property)?</p> <p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> <p>If yes, please specify these services and the contractual or leasing arrangements under which you are providing them.</p>	
<p>20 Will you be on-selling energy purchased from an authorised retailer or purchasing it directly from the wholesale market?</p>	<p>South Street Energy will on-sell electricity purchased from an authorised retailer.</p>
<p>21 What is the estimated annual aggregate amount of energy you are likely to sell (kilowatt hours or megawatt hours for electricity and mega joules or gigajoules for gas) and the average expected consumption of customers for each type of customer you service (residential customers, retail, or commercial customers)?</p>	<p>The 42 commercial/retail tenants at the Crossroads Homemaker Centre consume ~4.8 GWh of electricity annually.</p> <p>Small tenants consume an average 42MWh per annum and large tenants an average 200MWh per annum.</p> <p><i>Note that South Street Energy will initially on-sell ~1.2GWh of electricity to tenants as 18 tenants will continue to purchase ~3.6GWh of electricity from [REDACTED] authorised retailers under existing contracts.</i></p>
<p>22 Will your customers be wholly contained within a site owned, controlled, or operated by you?</p> <p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p><i>For the purposes of this question, a body corporate may be taken to 'operate' premises it oversees.</i></p>	<p>South Street Energy is engaged by The Landlord to occupy the site, provide market compliant smart-meters for each tenancy (via an AEMO accredited Metering Coordinator), and operate the site as an embedded network.</p>
<p>23 Will each premises/dwelling be separately metered?</p> <p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>If no, please explain why not and how you intend to determine energy charges.</p>	<p>Each premises will be metered by an AEMO accredited Metering Coordinator with market compliant smart meters registered to a unique NMI in MSATS by an AEMO registered Embedded Network Manager.</p>
<p>24 Will meters allow your customers to change retailers (i.e. not buy their energy from you) as required by the <a href="#">Network Exemptions Guideline</a>?</p> <p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Please specify the types of meters to be installed at the site.</p>	<p>Each premises will be metered by an AEMO accredited Metering Coordinator with market compliant smart meters registered to a unique NMI in MSATS by an AEMO registered Embedded Network Manager.</p>
<p>25 In what form, and how often, will you bill your customers? Will you be issuing bills yourself or through a billing agent?</p> <p>Please provide an energy bill sample.</p> <p><i>Condition 3 of the Retail Exempt Selling Guideline sets out our expectation around billing for residential customers.</i></p>	<p>South Street Energy will issue bills monthly to each commercial/retail tenant issued from Utilibill.</p> <p>There are three types of bills that will be sent:</p> <ul style="list-style-type: none"> <li>• bundled energy bill;</li> <li>• unbundled use of network bill; and</li> <li>• unbundled energy &amp; use of network bill.</li> </ul> <p>Refer attached examples.</p>
<p>26 What dispute resolution procedures do you intend to put in place to deal with energy-related complaints and issues?</p> <p>Confirm that your dispute resolution policy is consistent the <a href="#">Australian Standard AS10002:2022 Guidelines for complaint management in organizations</a> (or subsequent versions).</p> <p>Please provide a copy of the relevant policy.</p>	<p>Refer to the Customer Enquiry &amp; Complaint Policy attached with this Application.</p>

Requirement	Applicant response
Particulars relating to the nature and scope of the proposed operations	
<p>27 <i>This question only applies where residential customers are included in your application.</i></p> <p>Are you a member of a recognised energy industry ombudsman scheme in the jurisdiction/s in which you intend to on-sell energy to residential customers?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>n/a <input checked="" type="checkbox"/></p> <p>If no, have you taken steps to become a member?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>If yes, please provide supporting evidence or explain steps taken to obtain membership. Supporting evidence should include an ombudsman membership application reference number if attainable from the relevant ombudsman.</p> <p>If no, please explain the reasons you have not taken steps to become a member.</p> <p><i>An exempt seller must, (if permitted by an energy ombudsman scheme) be a member of, or subject to, an energy ombudsman scheme for each jurisdiction where it sells energy to exempt customers and must comply with the requirements of that scheme.</i></p>	<p>Residential customers are not included in the application.</p>
<p>28 Please provide any further information that would assist us to assess your application.</p>	<p>Please find attached the following documents in support of our application:</p> <ul style="list-style-type: none"> <li>• Crossroads Tenants Listing</li> <li>• Communications Log</li> <li>• Completed Consent Forms</li> <li>• Sample Letters dated 18 June 2024: <ul style="list-style-type: none"> <li>○ sent to tenants on bundled retail contracts [REDACTED]</li> <li>○ sent to tenants on unbundled retail contracts [REDACTED]</li> </ul> </li> <li>• Customer Agreements: <ul style="list-style-type: none"> <li>○ Electricity Purchase Agreement (relevant to tenants on bundled retail contracts)</li> <li>○ Use-of-Network Agreement (relevant to tenants on unbundled retail contracts)</li> </ul> </li> <li>• Electricity (Bundled) Rate Cards</li> <li>• Network (Only) Rate Cards</li> <li>• Policies: <ul style="list-style-type: none"> <li>○ Customer Enquiry &amp; Complaint Policy</li> <li>○ Privacy Policy</li> </ul> </li> <li>• Communications Files (sample): <ul style="list-style-type: none"> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> </ul> </li> </ul>

Requirement	Applicant response
<b>AER consultation process</b>	
<p>29 Have you advised customers of the AER's consultation process, including that the AER will:</p> <ul style="list-style-type: none"> <li>a. consult on individual exemption applications</li> <li>b. publish your application on its website</li> <li>c. invite public submissions on your application from interested stakeholders, and</li> <li>d. ensure that the public consultation period runs for at least 20 business days?</li> </ul> <p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Please provide evidence of your communication with customers regarding the above.</p>	<p><b>Attachment reference:</b> Refer email to tenants dated 31 October 2024</p>

## Converting embedded networks (retrofitting)

If you are planning to sell energy through a converted embedded network, your application needs to also address the following questions. If your application does not involve a retrofit you do not need to complete this section.


Requirement	Applicant response
<b>Converting embedded networks (retrofitting)</b>	
<b>Provision of information – attach evidence that you have supplied prospective customers with easily accessible written information explaining:</b>	
<p>30</p> <ul style="list-style-type: none"> <li>• you are proposing to retrofit the site as an embedded network, which requires metering changes and both the <b>pros and cons</b> of being an embedded network customer. <i>Examples may include, but are not limited to, customer information leaflets, brochures or copies of presentations.</i></li> </ul>	<p><b>Attachment reference:</b> The following materials inform prospective customers that South Street Energy will maintain a National Metering Identifier (NMI) and they will be provided with an upgraded, market compliant smart meter in order to freely switch between Retailers:</p> <ul style="list-style-type: none"> <li>• Sample Letters dated 18 June 2024: <ul style="list-style-type: none"> <li>○ sent to tenants on bundled retail contracts [REDACTED]</li> <li>○ sent to tenants on unbundled retail contracts [REDACTED]</li> </ul> </li> </ul>
<p>31</p> <ul style="list-style-type: none"> <li>• customers retain the right to contract with a retailer of choice even after inclusion in the embedded network (except where this right does not exist due to jurisdictional legislation).</li> </ul>	<p><b>Attachment reference:</b> The following materials inform prospective customers that they retain the right to choose their preferred Retailer:</p> <ul style="list-style-type: none"> <li>• Sample Letters dated 18 June 2024: <ul style="list-style-type: none"> <li>○ sent to tenants on bundled retail contracts [REDACTED]</li> <li>○ sent to tenants on unbundled retail contracts [REDACTED]</li> </ul> </li> <li>• Customer Agreements: <ul style="list-style-type: none"> <li>○ Electricity Purchase Agreement (relevant to tenants on bundled retail contracts)</li> <li>○ Use-of-Network Agreement (relevant to tenants on unbundled retail contracts)</li> </ul> </li> </ul>

Requirement	Applicant response
<b>Converting embedded networks (retrofitting)</b>	
	<p><i>Note that 18 tenants will continue to purchase electricity from [REDACTED] authorised retailers under existing contracts immediately after the site is retrofitted.</i></p>
<p>32</p> <ul style="list-style-type: none"> <li>to exercise their right to a retailer of choice, customers may need to enter into an 'energy only' contract, which is offered at retailers' discretion and may be difficult to obtain.</li> </ul> <p><i>We encourage applicants to provide prospective customers with a copy of our AER <a href="#">factsheet</a>, which explains the above in plain English and will satisfy this requirement.</i></p>	<p><b>Attachment reference:</b></p> <p>The following materials inform prospective customers that they may accept an energy only offer from their preferred Retailer:</p> <ul style="list-style-type: none"> <li>Sample Letters dated 18 June 2024: <ul style="list-style-type: none"> <li>sent to tenants on bundled retail contracts [REDACTED]</li> <li>sent to tenants on unbundled retail contracts [REDACTED]</li> </ul> </li> <li>Customer Agreements: <ul style="list-style-type: none"> <li>Electricity Purchase Agreement (relevant to tenants on bundled retail contracts)</li> <li>Use-of-Network Agreement (relevant to tenants on unbundled retail contracts)</li> </ul> </li> </ul> <p><i>Note that 18 tenants will continue to purchase electricity from [REDACTED] authorised retailers under existing contracts immediately after the site is retrofitted.</i></p>
<p>33</p> <ul style="list-style-type: none"> <li>customers in embedded networks may not receive the same protections as those of an authorised retailer under the National Energy Retail Law.</li> </ul>	<p><b>Attachment reference:</b></p> <p>When connected to the embedded network, prospective customers are subject to the following terms &amp; conditions:</p> <ul style="list-style-type: none"> <li>Customer Agreements: <ul style="list-style-type: none"> <li>Electricity Purchase Agreement (relevant to tenants on bundled retail contracts)</li> <li>Use-of-Network Agreement (relevant to tenants on unbundled retail contracts)</li> </ul> </li> </ul>
<p><b>Provision of information – in addition, you must provide evidence in your application you have provided customers with:</b></p>	
<p>34</p> <ul style="list-style-type: none"> <li>your electricity sales agreement, which details all fees and tariffs.</li> </ul> <p><i>The energy sales agreement must be provided to prospective customers <u>prior</u> to seeking their consent to the retrofit.</i></p>	<p><b>Attachment reference:</b></p> <p>When connected to the embedded network, prospective customers are subject to the following terms &amp; conditions:</p> <ul style="list-style-type: none"> <li>Customer Agreements: <ul style="list-style-type: none"> <li>Electricity Purchase Agreement (relevant to tenants on bundled retail contracts)</li> <li>Use-of-Network Agreement (relevant to tenants on unbundled retail contracts)</li> </ul> </li> </ul>
<p>35</p> <ul style="list-style-type: none"> <li>contact details of a representative from your company to answer any queries or concerns about the proposed retrofit.</li> </ul>	<p><b>Attachment reference:</b></p> <p>The following materials provided a contact details of a South Street Energy representative for prospective customers who may have queries in relation to the proposed embedded network:</p> <ul style="list-style-type: none"> <li>Sample Letters dated 18 June 2024:</li> </ul>



Requirement		Applicant response															
<b>Converting embedded networks (retrofitting)</b>																	
		<ul style="list-style-type: none"> <li>○ sent to tenants on bundled retail contracts [REDACTED]</li> <li>○ sent to tenants on unbundled retail contracts [REDACTED]</li> </ul>															
<b>Explicit informed consent<sup>2</sup> – to demonstrate that you have obtained customer consent you need to:</b>																	
36	<ul style="list-style-type: none"> <li>• provide evidence of their explicit informed consent to the proposed retrofit</li> </ul> <p><i>Please note we cannot access Dropbox and explicit informed consent evidence may need to be submitted separately to AERexemptions@aer.gov.au in PDF format, via multiple emails.</i></p> <p><i>If the proposed embedded network has more than 100 prospective customers, please contact us to seek permission to provide a sample of the explicit informed consent evidence. We will assess requests on a case-by-case basis.</i></p>	<table border="1"> <tr> <td>Number of customers who have provided explicit informed consent</td> <td>28</td> </tr> <tr> <td>Number of customers who have refused to provide explicit informed consent</td> <td>2</td> </tr> <tr> <td>Number of unresponsive customers</td> <td>3</td> </tr> <tr> <td>Common Areas</td> <td>5</td> </tr> <tr> <td>Vacant premises</td> <td>4</td> </tr> <tr> <td>Number of customers who are being wired out of the proposed embedded network</td> <td>0</td> </tr> <tr> <td><b>Total number of premises at the site</b></td> <td><b>42</b></td> </tr> </table>	Number of customers who have provided explicit informed consent	28	Number of customers who have refused to provide explicit informed consent	2	Number of unresponsive customers	3	Common Areas	5	Vacant premises	4	Number of customers who are being wired out of the proposed embedded network	0	<b>Total number of premises at the site</b>	<b>42</b>	
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<b>Total number of premises at the site</b>	<b>42</b>																
37	<ul style="list-style-type: none"> <li>• confirm the explicit informed consent % calculation for total numbers affected by the proposed retrofit.</li> </ul> <p><i>Vacant premises, common areas and 'wired out' customers should be excluded from the percentage calculations.</i></p> <p><i>If you can demonstrate at the conclusion of a marketing campaign that an 85% or greater majority of prospective customers have agreed to the retrofit, you may apply to the AER to convert the network. If the AER determines special circumstances apply, we may apply a lower or higher threshold to a specific application.</i></p>	<table border="1"> <tr> <td>% Of customers who have provided explicitly informed consent to the proposed retrofit</td> <td>85%</td> </tr> </table>	% Of customers who have provided explicitly informed consent to the proposed retrofit	85%													
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38	<ul style="list-style-type: none"> <li>• confirm that you sought consent separately from customers for the proposed retrofit and the energy sale agreement: <ul style="list-style-type: none"> <li>• Yes, consent was sought for the proposed retrofit, separately from the energy sales agreement <input checked="" type="checkbox"/></li> <li>• No, consent was <b>not</b> sought for the proposed retrofit, separately from the energy sales agreement <input type="checkbox"/></li> </ul> </li> </ul> <p>Provide an explanation of when and how consent documents were provided to prospective customers.</p>																
39	<ul style="list-style-type: none"> <li>• attach a prospective customer consent summary/communications log, including dated records of consultation and meetings with all customers affected by the proposed retrofit, identifying and recording any non-consent and the reasons for non-consenting.</li> </ul>	<p><b>Attachment reference:</b></p> <p>Please find attached customer consent &amp; communications log:</p> <ul style="list-style-type: none"> <li>• Crossroads Tenants Listing</li> <li>• Communications Log</li> <li>• Completed Consent Forms</li> </ul> <p><i>The two tenants who have refused to provide consent are part of multinational chains where</i></p>															

<sup>2</sup> The Network Exemptions Guideline provides further detail on explicit informed consent calculation requirements.

Requirement	Applicant response
<b>Converting embedded networks (retrofitting)</b>	
	<i>energy procurement and sustainability is centrally managed.</i>
<p>40</p> <ul style="list-style-type: none"> <li>provide evidence of your attempts to resolve any customer concerns relating to the proposed retrofit.</li> </ul>	<p><b>Attachment reference:</b> Please find attached customer communications files evidencing tenants queries and concerns, and resolutions:</p> <ul style="list-style-type: none"> <li>Communications Files (sample):</li> </ul>  <p><i>As the AER cannot access Dropbox we have chosen to provide an initial sample of our communications files.</i></p> <p><i>All communications files are available to the AER upon request.</i></p>
<b>Retail contestability – to demonstrate you have addressed any potential customer detriment resulting from a loss of retail contestability, you must confirm you have:</b>	
<p>41</p> <ul style="list-style-type: none"> <li>sought advice from the distributor about whether non-consenting customers can be wired out of the embedded network.</li> </ul> <p>Provide evidence of advice sought/received and details of any available 'wiring out' options.</p>	<p><b>Attachment reference:</b> South Street Energy has not offered to wire tenants out of the embedded network.</p>
<p>42</p> <ul style="list-style-type: none"> <li>taken steps to ensure customers who wish to remain with their retailer, but cannot be wired out, will not be financially disadvantaged by the retrofit.</li> </ul> <p>Measures to reduce financial detriment are likely to include price matching for affected customers and taking financial responsibility for any double billing of network charges.</p> <p>Provide evidence that supports your confirmation.</p>	<p><b>Attachment reference:</b> South Street Energy has taken steps to ensure tenants can remain with their current retailer. This includes:</p> <ul style="list-style-type: none"> <li>clearly stating to tenants that they retain the right to choose their preferred Retailer;</li> <li>maintaining a National Metering Identifier (NMI) registered in MSATS for each tennants; and</li> <li>providing each tenant with a market compliant smart meter in order to freely switch between Retailers.</li> </ul> <p>South Street Energy has also communicated with retailers to notify them of the intent to convert to an embedded network and seek their confirmation that contracts will continue without penalty.</p> <p><i>Note that 18 tenants will continue to purchase electricity from [redacted] authorised retailers under existing contracts immediately after the site is retrofitted.</i></p>
<b>Customer dispute resolution services</b>	
<p>43</p> <p>Provide evidence that you have advised customers of your dispute resolution process and the available options for external dispute resolution, such as ombudsman schemes. For individual exemptions relating to retrofits, we will assess the need for ombudsman scheme membership on a case-by-case basis.</p>	<p><b>Attachment reference:</b> Refer to the Customer Enquiry &amp; Complaint Policy attached with this Application.</p> <p>Policies have not yet been provided to tenants. Our intention is to distribute policies to tenants when we seek account registration details and consent to the relevant Customer Agreement:</p> <ul style="list-style-type: none"> <li>Electricity Purchase Agreement (relevant to tenants on bundled retail contracts)</li> </ul>

Requirement	Applicant response
<b>Converting embedded networks (retrofitting)</b>	
	<ul style="list-style-type: none"> <li>• Use-of-Network Agreement (relevant to tenants on unbundled retail contracts)energy sale agreement:</li> </ul>

Document attachment checklist	Tick as appropriate
Cover letter	<input checked="" type="checkbox"/>
Public application version with confidential information redacted, for publication on our website	<input checked="" type="checkbox"/>
Statement or letter verifying that a third party has the authority to act on your behalf (if relevant)	<input type="checkbox"/>
Site map	<input type="checkbox"/>
Sample energy bill	<input type="checkbox"/>
Energy sales agreement	<input checked="" type="checkbox"/>
Proposed dispute resolution policy	<input checked="" type="checkbox"/>
Evidence of efforts to obtain ombudsman scheme membership (if relevant)	<input type="checkbox"/>
Evidence that customers have been advised they retain the right to contract with a retailer of choice	<input checked="" type="checkbox"/>
<p data-bbox="156 734 427 763"><i>Retrofit applications only</i></p> <p data-bbox="156 770 774 799">Marketing campaign evidence, including and evidence of:</p> <ul data-bbox="156 806 1018 1025" style="list-style-type: none"> <li>• information provision (see 30-34)</li> <li>• explicit informed consent (see 36)</li> <li>• a prospective customer consent summary/communications log (see 39)</li> <li>• engagement with the distributor (see 41)</li> <li>• attempts to resolve prospective customer concerns (see 40)</li> <li>• providing prospective customers their options for dispute resolution (see 43).</li> </ul>	<input checked="" type="checkbox"/>